INTERMOUNTAIN POWER SERVICE CORPORATION

FILE

File: 01.03.10
43.4000

August 15, 1989

Mr. Brent C. Bradford
Executive Secretary
Utah Bureau of Solid and Hazardous Waste
288 North 1460 West
P.O. Box 16690
Salt Lake City, UT 84116-0690

Mr. F. Burnell Cordner
Executive Secretary
Utah Bureau of Air Quality
288 North 1460 West
P.O. Box 16690
Salt Lake City, Utah 84116-0690

Gentlemen:

Disposal Of Used Oil On The Active Coal Pile
To Be Blended And Burned
With The Coal In IPSC's Furnace

This letter is a notification of our intention to spray our self-generated used oil on the active coal pile. This oil will be blended with the coal and burned in our furnace. We generate approximately 24,000 gallons of used oil per year. The annual coal burned in Units 1 and 2 in 1988 was 4,603,200 tons.

40 CFR, Subpart E, Part 266.40 defines Used Oil Burned for Energy Recovery. Part 266.40(e) says "Used oil fuel that meets the specification is subject only to analysis and record-keeping requirements under Part 266.43(b)(1) and (6)." Attachments I and II show typical chemical analysis of our used oil. According to this analysis our used oil is termed "on-specification used oil fuel", which can be burned in our industrial furnace.

The Code of Federal Regulations clearly defines that IPSC can burn their used oil for energy recovery. Are there any State of Utah, Department of Health, permit requirements that we must be aware of?

Brush Wellman Road, Delta, Utah / Mailing Address: Rt. 1, Box 864, Delta, Utah 84624 / Telephone: (801) 864-4414 / FAX: (801) 864-4970

Mr. Brent C. Bradford
Mr. F. Burnell Cordner
Page 2
August 15, 1989

If you have any verbal comments and/or questions, please contact Craig Lucy at (801) 864-4414, extension 6494. Please provide us with a written response within 3 days of receipt of this letter.

Sincerely,

S G Chapman by nam 8/15/89

S. Gale Chapman
President & Chief Operations Officer

RCL:jas
Attachment

cc: Bruce E. Blowey
Robert A. Davis
Joe D. Hamblin

ATTACHMENT 1

CHEMTECH

CHEMICAL AND BACTERIOLOGICAL ANALYSES

FILE

6100 S. STRATLER
MURRAY, UTAH 84107
(801) 262-7299

DATE: 8-9-89

TO: Intermountain Power Service Corporation
Brush Wellman Road
RT 1 Box 864
Delta, UT 84624

SAMPLE ID: Lab #U043280 - Used Waste Oil (7000 Gal. in Tank)
7-18-89 @1400, Submitted 7-20-89

CERTIFICATE OF ANALYSIS

PARAMETER	LEVEL
pH Units	6.8
Flash Point	>200°F
PCB's, mg/Kg	<5
Arsenic as As, mg/Kg	0.22
Barium as Ba, mg/Kg	<.1
Cadmium as Cd, mg/Kg	<.1
Chromium as Cr, mg/Kg	<.1
Lead as Pb, mg/Kg	2.2
% Water	<.5
TOX (Total Halogens), mg/Kg	32

Rex Henderson

ATTACHMENT II

CHEMTECH

CHEMICAL AND BACTERIOLOGICAL ANALYSES

6100 S. STRATLER
MURRAY, UTAH 84107
(801) 262-7299

DATE: 3-21-89

TO: Intermountain Power Service Corporation
Brush Wellman Road
RT 1 Box 864
Delta, UT 84624

SAMPLE ID: Lab #U039600 - Waste Oil Tank, 3-16-89, Submitted on 3-17-89

CERTIFICATE OF ANALYSIS

PARAMETER	LEVEL
pH Units	6.4
Flash Point	>200°F
PCB's, mg/Kg	<1
Arsenic as As, mg/Kg	<.1
Barium as Ba, mg/Kg	2.8
Cadmium as Cd, mg/Kg	1.1
Chromium as Cr, mg/Kg	0.68
Lead as Pb, mg/Kg	4.02
% Water	<.5
TOX, mg/Kg	102

Rex Henderson

CHEMTECH

CHEMICAL AND BACTERIOLOGICAL ANALYSES

6100 S. STRATLER
MURRAY, UTAH 84107
(801) 262-7299

TO: Intermountain Power Service Corporation
Brush Wellman Road
RT 1 Box 864
Delta, UT 84624

DATE: 3-21-89

SAMPLE ID: Lab #U039600 - Waste Oil Tank, 3-16-89, Submitted on 3-17-89

CERTIFICATE OF ANALYSIS

PARAMETER (F-SOLVENTS)	LEVEL	MDL, mg/Kg
Acetone, mg/Kg	<.5	0.5
Benzene, mg/Kg	<.5	0.5
N-butyl alcohol, mg/Kg	<.5	0.5
Carbon Disulfide, mg/Kg	<.5	0.5
Carbon Tetrachloride, mg/Kg	<.5	0.5
Chlorinated fluorocarbons, mg/Kg	<.5	0.5
Chlorobenzene, mg/Kg	<.5	0.5
Cresols (and cresylic acid), mg/Kg	<.5	0.5
Cyclohexanone, mg/Kg	<.5	0.5
1,2-Dichlorobenzene, mg/Kg	<.5	0.5
2-Ethoxyethanol, mg/Kg	<.5	0.5
Ethyl acetate, mg/Kg	<.5	0.5
Ethyl benzene, mg/Kg	0.62	0.5
Ethyl ether, mg/Kg	<.5	0.5
Isobutanol, mg/Kg	<.5	0.5
Methanol, mg/Kg	<.5	0.5
Methylene chloride, mg/Kg	44.2	0.5
Methyl ethyl ketone, mg/Kg	<.5	0.5
Methyl isobutyl ketone, mg/Kg	<.5	0.5
Nitrobenzene, mg/Kg	<.5	0.5
2-Nitropropane, mg/Kg	<.5	0.5
Pyridine, mg/Kg	<.5	0.5

Rex Henderson

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TO: Intermountain Power Service Corporation
Brush Wellman Road
RT 1 Box 864
Delta, UT 84624

DATE: 3-21-89

SAMPLE ID: Lab #U039600 - Waste Oil Tank, 3-16-89, Submitted on 3-17-89

CERTIFICATE OF ANALYSIS

PARAMETER (F-SOLVENTS)	LEVEL	MDL, mg/Kg
Tetrachloroethylene, mg/Kg	<.5	0.5
Toluene, mg/Kg	<.5	0.5
1,1,1-Trichloroethane, mg/Kg	<.5	0.5
1,1,2-Trichloroethane, mg/Kg	<.5	0.5
1,1,2-Trichloro-1,2,2-trifluoroethane, mg/Kg	<.5	0.5
Trichloroethylene, mg/Kg	<.5	0.5
Trichlorofluoromethane, mg/Kg	<.5	0.5
Xylenes, mg/Kg	<.5	0.5

Rex Henderson